

# **Exhibit B**

Deposition of Wesley Donehue

1 (1 - 4)

Page 1

1 STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
2 COUNTY OF CHARLESTON ) THE NINTH JUDICIAL CIRCUIT  
3 ) CASE NO: 2025-CP-10-00981  
4 GLT2, LLC, )  
5 Plaintiff, )  
6 vs. )  
7 )  
8 JANE DOE and JOHN DOE, )  
9 Defendants. )  
10 \_\_\_\_\_)  
11  
12  
13  
14  
15  
16 The Zoom deposition of WESLEY DONEHUE, taken  
17 before Lori Webber, Stenographic Court Reporter and Notary  
18 Public, at Clark Bolen, 29 Gamecock Avenue, Suite 200,  
19 Charleston, South Carolina, on Monday, April 28, 2025,  
20 commencing at 10:16 a.m.  
21  
22  
23  
24  
25

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25

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1 WESLEY DONEHUE,  
2 being first duly sworn by LORI WEBBER, a Notary Public  
3 within and for the State of South Carolina, was examined  
4 and testified on his oath as follows:  
5 EXAMINATION  
6 BY MR. BREWER:  
7 Q Mr. Donehue, thank you for being here with us  
8 today. My name is Barrett Brewer, and I am here on behalf  
9 of GLT, LLC, to take a deposition regarding information  
10 you might have in terms of your relationship,  
11 communications, conversations with Nancy Mace.  
12 Let me start from the beginning. Could you  
13 please state your full name for the record?  
14 A John Wesley Donehue; and I go by my nickname,  
15 Wesley.  
16 Q All right.  
17 And are you a Charleston County resident?  
18 A No, sir; I'm a Dorchester County resident.  
19 Q Gotcha.  
20 Let me get some background from you real quick.  
21 Where'd you go to college at?  
22 A University of South Carolina.  
23 Q Okay.  
24 And what is your current occupation and is it  
25 relevant to anything you did at USC?

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1 A I am an entrepreneur and political consultant.

2 Q I understand that you have or are a member of

3 or have ownership in four different companies related to

4 your political consulting?

5 A Yes. But it's more than that. I mean, for

6 matters of this, Push Digital Group has four public

7 companies, but it also has a few other subsidiary

8 companies used for various things.

9 Q Gotcha.

10 A I actually have no idea how many companies I

11 own, if you wanna know the truth, but it's more than four.

12 Q Gotcha.

13 So of the companies that you own that are

14 relevant to our inquiry regarding Nancy Mace, her

15 campaign, or anything to do with her congressional office,

16 that would be Push, Drive, and Campaign Solutions?

17 A It would be. But I will tell you, Drive Public

18 Affairs did a rebrand about a year, year and a half ago.

19 So anything related could've been under a former company

20 name called Push Advocacy. No; actually, it would've been

21 Laurens Group. I'm sorry; it would've been called Laurens

22 Group.

23 Q Are these all South Carolina entities?

24 A They are not. I have a partner based out of

25 Dallas, Texas. I believe they're all Texas entities, if

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1 I'm not mistaken.

2 Q Okay.

3 So to the extent I'm using the appropriate

4 name, when we talk about Push, what's the appropriate

5 corporate name for Push?

6 A So there's Push Digital Group.

7 Q Your umbrella.

8 A The umbrella accompany. And there are four

9 main companies under that: Push Digital, which is a

10 advertising and content development company; Campaign

11 Solutions is a fundraising company; Drive Public Affairs,

12 formerly known as Laurens Group, is a corporate

13 communication company that also handles congressional

14 franking; (inaudible).

15 THE STENOGRAPHIC REPORTER: I'm sorry;

16 what was the last one?

17 THE WITNESS: Drive Public Affairs,

18 previously known as Laurens Group.

19 THE STENOGRAPHIC REPORTER: Okay; I got

20 that one.

21 THE WITNESS: And the fourth group is

22 Right Country Lists. We call it RCL, but I don't think it

23 has anything to do with this. I don't think it ever did

24 any business with the campaign or the congressional

25 office.

1 BY MR. BREWER:

2 Q Okay.

3 In coming to discuss your involvement with

4 Ms. Mace professionally, individually, or through any of

5 these entities, we sent you a subpoena on April 3rd, 2025.

6 And I've got a picture of that up on the screen. Can you

7 confirm this is the subpoena that you received that led to

8 your deposition here today?

9 A Yes, sir.

10 Q Of course, you are represented by counsel here,

11 which is Mr. MacKelcan; is that correct?

12 A Yes, sir.

13 Q All right.

14 One of the things we asked is that you bring

15 with you any notes, reports, basically, documentation that

16 you thought might be relevant to the deposition today.

17 Did you produce any type of documentation, communications,

18 texts, et cetera, that you need to produce to us today or

19 that you might've produced to Mr. MacKelcan that we need

20 to see?

21 A I did not.

22 Q Okay.

(Discussion held off the record.)

24 BY MR. BREWER:

25 Q So I've shown you Exhibit A, which is the

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1 subpoena. And obviously, sometimes we send subpoenas that

2 have requests because I don't know what you have and what

3 you don't have. So I guess one thing that I'd like to ask

4 right now is if you didn't bring any documents with you,

5 I'd like to know what might exist out in the world; right?

6 And also, this is gonna be part of our communication for

7 the next hour or so because you had communications with

8 Ms. Mace. You could've had those in your capacity

9 personally or individually.

10 A Yes.

11 Q You could've had those communications through

12 any one of your multiple entities wearing that hat, if you

13 will; right?

14 A Yes.

15 Q And that might control whether or not what

16 records you may or may not have or what company may or may

17 not have, so I just need to figure out what we're

18 discussing and what the world of potential things that

19 exist might be.

20 So did you ever have -- if you communicated

21 with Ms. Mace, did you communicate with her by social

22 media apps or direct messaging apps or anything like that?

23 A Yes. Most of my communications with Nancy were

24 either on the phone or through Signal. There were very

25 few actual text messages; and anything e-mail would've

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1 been actual work related. And I'm sure that I can pull  
 2 hundreds, if not thousands, of those records if I needed  
 3 to.  
 4 Q I got it.  
 5 Well that's why I didn't want you to go through  
 6 all that work at this moment unless we determined we might  
 7 need; right?  
 8 A It would be quite a big haul.  
 9 Q Well if you communicated via Signal, would  
 10 Signal be all work, all personal, or combination of work  
 11 and personal?  
 12 A Combination.  
 13 Q Okay.  
 14 Did you save any Signal communications between  
 15 yourself and Ms. Mace?  
 16 A No.  
 17 Q And to make sure I'm using -- sometimes I find  
 18 I have to ask questions different ways to make sure we're  
 19 saying the same thing.  
 20 Are there any screenshots of any Signal  
 21 communications?  
 22 A No.  
 23 Q Okay.  
 24 Do you remember when you first got introduced  
 25 to Ms. Mace? Like roughly, when did the timeline of

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1 communications with her start?  
 2 A I mean, I've known Nancy for well over a  
 3 decade. I have no idea.  
 4 Q Okay.  
 5 So you had a personal relationship before it  
 6 became professional?  
 7 A No. I mean, it was always more professional.  
 8 Nancy tried to start a digital agency 15 years ago when I  
 9 was -- you know, it failed and mine didn't; so we knew  
 10 each other when she was bouncing around in South Carolina  
 11 politics. And then I knew her when she was a House  
 12 member. And, you know, when she decided to run for  
 13 Congress, I reached out to her and we met for coffee  
 14 about, you know, helping her on her campaign.  
 15 Q Got it.  
 16 So was that the first professional initiation  
 17 of your professional relationship with Nancy in terms of  
 18 actually doing work, paid work, for her in some capacity  
 19 started with her initial run for the House seat in  
 20 Charleston?  
 21 A Yes. You can google that year. I don't even  
 22 remember when it was.  
 23 Q I don't, either.  
 24 A They're every two years.  
 25 Q The race that she ran against Joe Cunningham.

1 A Yeah.  
 2 Q Okay.  
 3 A She ran -- I guess that was 2018?  
 4 Q Sounds about right. It looks like, yeah, the  
 5 election was -- where she beat him was November 4th of  
 6 2020.  
 7 A Oh, '20; okay.  
 8 Q So to your credit, Joe must've started serving  
 9 in '18, which meant Nancy would've been mounting her  
 10 campaign sometime '18 or '19.  
 11 A All these election years run together for me.  
 12 Q I'm certain that's true.  
 13 So initially when you reach out and have coffee  
 14 with Nancy, that initially is going to be a relationship  
 15 between you and Nancy individually and between what  
 16 company and Nancy? Is that the --  
 17 A Push Digital.  
 18 Q Push Digital or Campaign Solutions in --  
 19 A We acquired Campaign Solutions in the end of  
 20 2022, so Campaign Solutions wouldn't have been under our  
 21 umbrella at that moment.  
 22 Q So is this Laurens Group or Push Digital or  
 23 both?  
 24 A It would've been Push Digital.  
 25 Q In 2018 or '19 -- whenever started the

Page 12

1 arrangement with Ms. Mace's campaign -- is Push Digital --  
 2 what is Push Digital doing for the campaign?  
 3 A At that time -- you know, I don't recall  
 4 exactly, but I believe it was, you know, just overall  
 5 digital strategy, content, and advertising. And probably  
 6 some fundraising, too. I'd have to go back and pull the  
 7 contract and look at those records. I just don't recall  
 8 the exact dates, but it should've fallen under that  
 9 category, digital strategy.  
 10 Q Do you enter into a new contract for every  
 11 campaign or one contract at the beginning and that governs  
 12 your whole relationship?  
 13 A I don't know the answer to that. I believe it  
 14 just stays from the beginning.  
 15 Look, I should also just very clearly state on  
 16 the record the Push Digital is a larger company, over 80  
 17 staff. I think now we're probably at like 75 staff. So  
 18 there's a lot that goes on at the company that I don't  
 19 necessarily know about. Like we have two guys that handle  
 20 all these contracts; so I'm not always in the loop on how  
 21 certain things get done with the company, such as when  
 22 people sign contracts. I believe -- it's really a  
 23 question I don't know the answer to that one.  
 24 Q So tell me about -- hold on one quick second.  
 25 I just gotta text my wife something. I just got a note

Page 13

1 she needs me to confirm.

2 So did you develop a personal relationship with  
3 Nancy simultaneous with the Push Digital relationship in  
4 2018 or '19?

5 A Yeah; we became friends. You know, in the  
6 position I have, you become a close confidante to a lot of  
7 these candidates.

8 Q I can imagine that.

9 Did you come to know Patrick Bryant through  
10 your relationship with Nancy Mace or did you know Patrick  
11 separately?

12 A I knew Patrick separately. I knew Patrick, I  
13 should say, probably around 10 years now. When I moved my  
14 family and the company from Columbia to Charleston, I  
15 joined The Harbor Entrepreneur Center. And through that,  
16 I met Patrick.

17 Q When did --

18 A I knew them independently of each other before  
19 they were dating.

20 Q Do you recall when they started dating or how  
21 that intertwined or intervened with your campaign  
22 relationship with Nancy?

23 A Oh, yeah. I mean, I don't remember the  
24 timeline or the dates or anything; but I very clearly  
25 remember like, you know, talking to both of 'em.

Page 14

1 Q Okay.

2 A You know, like this is interesting.

3 Q Yeah; right. Your world kinda came together,  
4 huh?

5 A Right.

6 Q Do you recall in your personal experience with  
7 Nancy Mace, either in her individual capacity or through  
8 her campaign or her congressional capacity, do you recall  
9 when Nancy and Patrick's relationship began to show signs  
10 of trouble? Like do you have a recollection of when that  
11 was?

12 A I don't recall specifically, because there were  
13 numerous instances of trouble along the way.

14 Q I got it. I understand. Let me be a little  
15 more precise.

16 Do you remember when Nancy and Patrick broke  
17 up?

18 A Oh, yeah; yeah. But they were having trouble  
19 before they broke up; but yeah, I remember clearly.

20 Q I get that.

21 A Yeah.

22 I know this isn't a question, but the Post and  
23 Courier article about their breakup, I literally wrote the  
24 statement for Patrick and for Nancy. I was very much in  
25 the middle of their breakup.

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1 Q When you write the Post and Courier article  
2 about the breakup of Patrick and Nancy, are you doing that  
3 as a friend, do you do that as a campaign -- like is it  
4 involved with Nancy's campaign, do you do it involved with  
5 her office? Like what is that role?

6 A It's as Nancy's advisor. And, you know, I was  
7 helping Patrick as a friend; but also, as Nancy's advisor,  
8 I wanted to make sure that he wasn't taking any stabs at  
9 her. So I guess for Nancy, I was doing it for the  
10 campaign. For Patrick, I was doing it both for Patrick  
11 and for Nancy. You know, I was just trying to make sure  
12 that neither one of them were going to get hurt in the  
13 middle of this breakup so I was trying to help with a  
14 amicable public breakup, if that makes sense.

15 Q Yeah.

16 To the extent -- let me ask you a different  
17 question. This is gonna be kinda about your background  
18 and expertise with a political office. The purpose of my  
19 questioning, as you've heard so far, I'm kinda asking  
20 questions about is this in this person's individual life,  
21 is a question involving their campaign organization or  
22 that part of their life, or does it involve the actual  
23 congressional office?

24 A Then or now?

25 Q Let me ask a different question.

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1 Tell me about the part of your business or  
2 companies that deal with the campaign office. I wanna get  
3 an understanding of your experience with that. Because we  
4 talked about the franking, but I get a sense that what you  
5 do is more involved for a politician's actual  
6 congressional office than just the franking. So tell me  
7 what your experience is in that role, about how a  
8 congressional office works. Or what your intersection  
9 with that is.

10 A In an official capacity from a congressional  
11 office, I've been pretty much limited to the franking  
12 aspect. And again, franking being the money that  
13 government gives a office to communicate with their  
14 constituents. With that said, when you're working with a  
15 politician, your role is all-encompassing and it often  
16 blurs the lines between -- and in often, I mean always  
17 blurs the lines between their official capacity, their  
18 campaign life, and their personal life. They all flow  
19 together, as you can imagine. What happens in an official  
20 office impacts a campaign. What happens in their personal  
21 life impacts the campaign. My primary job is to get  
22 people elected and/or re-elected. Therefore, every action  
23 a client takes impacts that. Does that make sense?

24 Q Yeah.

25 A Okay.

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Page 19

1 Q No, I do understand.  
2 Were there ever any personal aspects to your  
3 relationship that affected your professional relationship  
4 with Nancy?  
5 A Yes.  
6 Q Okay.  
7 Tell me about that.  
8 A More so than any client I've ever worked with,  
9 Nancy blurred the lines between personal and official. To  
10 the point that a professional relationship becomes very  
11 unprofessional very soon, very quickly. And that the way  
12 that she talks to people because she thinks they're her  
13 friends, when she communicates with them at all hours of  
14 the nights and weekends and holidays, yelling at people  
15 all the time, talking about things that are very  
16 inappropriate. And in this case, asking me to intervene  
17 in her relationship problems with Patrick Bryant.  
18 Q Right.  
19 When do you first recall Nancy asking you to  
20 intervene with her relationship problems with Patrick  
21 Bryant? When about are we talking?  
22 A I don't remember the date, but I remember one  
23 of the first times was when Patrick Bryant's son got into  
24 some legal problems and Nancy was worried that the son's  
25 legal problems were gonna hurt her reputation. She wanted

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1 Patrick's son -- and I don't remember his name -- out of  
2 their house and to not come around anymore; and she asked  
3 me to meet with Patrick, which I did, at a restaurant on  
4 Shem Creek. I can't remember the name of it. But she  
5 asked me to meet with Patrick, and I did. And, you know,  
6 I talked to Patrick, but I did not do what Nancy asked me  
7 to do.  
8 Q Meaning you didn't raise the issue about his  
9 son?  
10 A Meaning I didn't -- when I met with Patrick, he  
11 was a distraught father. And he was very emotional and  
12 upset about his son, and it wasn't -- I quickly realized  
13 it was not the place or time to talk to him about Nancy's  
14 political career when he was worried about his son's life.  
15 Q When you mentioned about Nancy saying things  
16 that are inappropriate, is that one of the examples of  
17 what you were referring to?  
18 A No.  
19 Q What are the examples of Nancy saying things  
20 that are inappropriate that you were referring to?  
21 A Nancy -- Nancy talks about her sex life in a  
22 way that I've never heard a client or a woman talk about.  
23 She -- and this goes beyond Patrick. This is with  
24 multiple partners. She loves talking about sex.  
25 Q Okay.

1 And she would just do that in the workplace  
2 just unrelated to -- I guess the question is that she  
3 would just talk about her own personal sex life, thus  
4 making it inappropriate because it has no bearing on her  
5 congressional life or her job or her campaign?  
6 A She would do it on -- you know, she would call  
7 me directly. When we were talking, you know, say "Hey,  
8 how you doing?" Then it would turn into a, you know --  
9 it's like every conversation would devolve into what's  
10 going on in her sex life. Sometimes it would be on the  
11 phone, sometimes it would be over drinks; but it's just  
12 something that she talked about all the time and I always  
13 felt uncomfortable with.  
14 Q Did she admit to having sex partners outside of  
15 Patrick Bryant while she's engaged with Patrick Bryant?  
16 A No.  
17 Q Was that a suspicion that you had based on the  
18 conversations or when you said she talks about other  
19 partners --  
20 A No, no, no. I'm sorry; let me clarify. Other  
21 partners before Patrick.  
22 Q Okay; sorry.  
23 A I understand how that comment could've made it  
24 sound like that. I meant partners before Patrick. I  
25 never got an indication that she was seeing someone else

Page 20

1 while she was with Patrick.  
2 Q Gotcha; gotcha; gotcha; gotcha.  
3 All right; so you -- I asked you a question  
4 about asking you to intervene in her relationship with  
5 Patrick. The example you gave me the first time was when  
6 she asked you to speak to Patrick about his son. Were  
7 there other times when Nancy asked you to intervene in her  
8 relationship with Patrick Bryant?  
9 A Yes.  
10 Q What's the next time that you remember?  
11 A I mean, there were multiple times while they  
12 were still together, including helping them with the  
13 breakup. There were other times related to Patrick's son  
14 after that time. But the big one is -- was after they had  
15 broken up, which is what led to one of the reasons I ended  
16 up letting her go as a client.  
17 Q Talk to me about that. What is the big one  
18 that you remember?  
19 A She asked me to relay some messages to Patrick  
20 regarding the photos and videos that she found on his  
21 phone and other devices.  
22 Q Okay.  
23 Well let me stop for a second and ask you:  
24 Before Nancy asked you to intervene with Patrick about  
25 photos and videos, had you heard prior to that request

Page 21

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1 about Nancy finding photos and videos on Patrick's phone?  
2 A Yes.  
3 Q I guess let's start there.  
4 What did she tell you?  
5 A She called me one day, asked me to meet her for  
6 lunch, which I did, at Shiki, which is a sushi restaurant  
7 on East Bay Street right next door to my office. And she  
8 showed me some photos and told me that she found a number  
9 of photos and videos that Patrick had taken of women  
10 without their consent or knowledge.  
11 Q Do you recall what the videos she showed you  
12 depicted?  
13 A I don't think she showed me any videos that  
14 day; she showed me photos. One was of a girl on a couch  
15 -- as she says -- passed out with a blanket over her. She  
16 showed me a picture of [REDACTED] -- a picture  
17 seemingly up [REDACTED] skirt taken by (inaudible).  
18 When I say skirt, I mean one of those coverups that women  
19 wear over bikinis.  
20 Q Yep.  
21 A And a picture of her that was more blurry. I  
22 couldn't really see Nancy naked, but a picture of Nancy  
23 that she said she was getting up to go to the bathroom and  
24 that Patrick took pictures of her; and then there was a  
25 few other women in similar situations that Nancy told me

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1 Patrick took without these women knowing about it.  
2 Q Okay.  
3 What was her purpose in meeting with you to  
4 show you those pictures at Shiki on this date?  
5 And let me just go back.  
6 Do you remember roughly when the lunch meeting  
7 at Shiki would've been?  
8 A I remember roughly, because I remember the  
9 circumstances surrounding it, which was Patrick was  
10 celebrating his 50th birthday in the Caribbean. And it  
11 was about three to four days before Nancy was leaving to  
12 meet him for his birthday. Because that was a large part  
13 of the conversation.  
14 Q Okay.  
15 A I believe that was in, you know, like late  
16 November of 2023, but I don't know when Patrick's birthday  
17 is. But if you look it up, it would be basically a few  
18 days before his birthday in 2023.  
19 Q Okay; thank you.  
20 So was she -- you know, listen. I want you to  
21 know that I heard your answer about the blurring of lines  
22 between capacities, and that's probably not gonna change  
23 the fact that I'm gonna ask you in what capacity were you  
24 meeting with her. And if you need to give me a similar  
25 answer, just understood I heard you but I need to ask

1 these questions.  
2 So when you met with her at Shiki, do you know,  
3 was that personal, was it related to campaign, was it  
4 related to official or --  
5 A It definitely wasn't official. I mean, again,  
6 it's that blurred line between campaign and personal.  
7 Trying to be her friend and trying to be her campaign  
8 advisor at the same time, which is not an abnormal  
9 situation for me to be in.  
10 Q Well let me clarify that real quick.  
11 To the extent we talk about a lot of things  
12 with blurred lines dealing with Nancy, for you, that would  
13 primarily be a blurred line between you in your capacity  
14 working with her campaign or being basically a campaign  
15 manager and Nancy's personal life as opposed to her  
16 congressional office; is that fair?  
17 A Yeah; that's fair.  
18 Q And because your role with the campaign was  
19 somewhat limited to the franking, that's why I asked that  
20 question.  
21 A Yes. Yeah; but again, in my capacity, I don't  
22 look at -- I understand that there is a legal separation  
23 between them; but when you're helping a candidate, you're  
24 helping that person in all of their capacities. So it's  
25 normal to blur the lines between personal and campaign;

Page 24

1 it's just not normal for a personal relationship to become  
2 so hostile.  
3 Q Yeah.  
4 When you get paid by Nancy's -- or your company  
5 gets paid by Nancy's company, how does that compensation  
6 structure work?  
7 A We get paid hourly -- no, I'm sorry; let me  
8 back up.  
9 We get paid a retainer that's a flat fee; but  
10 we also make money off of advertising fees, as well as  
11 fundraising fees whenever we raise money for her.  
12 Q So there's no like hourly billing where you  
13 could go back and find this meeting at Shiki on an hourly  
14 billing sheet of some sort; right?  
15 A We just can't do that because we get calls,  
16 texts. There's just no way. I mean, our staff does keep  
17 track of hours, but not the consultant level. The  
18 designers, videographers, those kind of people track their  
19 hours. But those of us that are consultants, we don't  
20 have the capacity to do that.  
21 MR. BREWER: That sounds good, doesn't  
22 it, Doug?  
23 THE WITNESS: You guys have it good;  
24 trust me.  
25 ///

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1 BY MR. BREWER:  
 2 Q All right.  
 3 All right; so Nancy shows you these videos and  
 4 photos that we just discussed, and I'm gonna break 'em  
 5 down. The picture of the girl with the blanket on her,  
 6 the [REDACTED] up skirt, the picture of her that was  
 7 blurry, and then several other women in similar situations  
 8 is how you described it.  
 9 A Yep.  
 10 Q What did she have to say about those photos?  
 11 What was she telling you about 'em?  
 12 A That Patrick was doing some shady things and  
 13 that she was upset and felt for her safety and was  
 14 planning on breaking up with him.  
 15 Q Okay.  
 16 A Also -- forget it; go ahead. I'm sorry.  
 17 Q Go ahead.  
 18 A This conversation at Shiki was -- there was  
 19 much more to it than that, I guess is what I'm saying.  
 20 Q Okay.  
 21 What was more to the meeting at Shiki than just  
 22 the photos that you recall?  
 23 A I'm just trying to figure out the best way to  
 24 word this.  
 25 Nancy said she felt for her safety and that she

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1 believed that Patrick was taking pictures of women without  
 2 their knowledge.  
 3 Q Okay.  
 4 A She then said she was going to the Caribbean  
 5 with Patrick and some of his friends, which I questioned;  
 6 because I said "Nancy, you can't say you fear for your  
 7 safety and you're going to the Caribbean with him and some  
 8 of his friends." Then she said -- I remember as clear as  
 9 day -- "I'm taking my free vacation to the Caribbean."  
 10 And she said while she was there she was gonna try to get  
 11 more information out of his phone; and I told her that she  
 12 needs to contact the authorities, and she asked me why.  
 13 And I said "Because, Nancy" -- I remember it as clear as  
 14 day. I said "Nancy, as your campaign consultant, if it  
 15 ever comes out that you knew of women being harmed and you  
 16 didn't do anything about it, your career is over. But  
 17 also, it's just the right thing to do."  
 18 Q Uh-huh (counsel indicated an affirmative  
 19 response).  
 20 A And she said "I'm going to use this information  
 21 to get my houses."  
 22 Q Okay.  
 23 Let's talk about that for a minute. What do  
 24 you know about quote Nancy's houses?  
 25 A During the breakup -- what do I know? Let me

1 answer your question. I know they co-owned two houses  
 2 together, one on Capitol Hill and one on Isle of Palms.  
 3 Q Let me stop and do things for a second. I just  
 4 wanna show a couple of records, just kinda get caught up  
 5 on exhibits, because I didn't show you B, and C is  
 6 relevant to this. So let me share my screen real quick,  
 7 because I have a question I wanted to ask you briefly  
 8 about Exhibit B. Exhibit B is only a short detour in the  
 9 extent that I'm talking about Nancy's campaign.  
 10 A Uh-huh (witness indicated an affirmative  
 11 response).  
 12 Q I got this off the Federal Election Commission  
 13 website.  
 14 A Okay.  
 15 Q And this shows -- is the formal name of Nancy's  
 16 campaign Nancy Mace For Congress? Does that seem  
 17 accurate?  
 18 A Seems accurate; yeah.  
 19 Q To the extent that I know she has an interest  
 20 in running for governor -- and I don't know if you know  
 21 this -- is her campaign for governor still this Nancy Mace  
 22 For Congress entity or is there a separate one or do you  
 23 not know the answer?  
 24 A I do not know the answer; but she would not  
 25 have filed for governor yet, so such an entity probably

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1 does not exist. I don't know that for a fact; but putting  
 2 my campaign hat on -- the official answer I know I'm  
 3 supposed to give is I don't know, but I'm also telling you  
 4 she wouldn't of. Nobody's filed for governor yet.  
 5 Q Do you know who Paul Kilgore is? This guy  
 6 who's listed right here?  
 7 A No, sir.  
 8 Q Is he, to your knowledge, in any way involved  
 9 with the campaign? You don't know who he is, but have you  
 10 ever heard of him?  
 11 A I have no idea who that is.  
 12 Q All right.  
 13 Let's do this again. I'm now gonna show you a  
 14 new document, which is Exhibit C. I'm gonna pull that up.  
 15 I'm gonna share the screen again. Can you guys see  
 16 Exhibit C now, the complaint?  
 17 A Yes, sir.  
 18 Q This was a lawsuit that Nancy Mace brought  
 19 against Patrick Bryant on April 2nd, 2024. And this  
 20 involves a dispute of a real property. I'm looking at  
 21 paragraph 3 on the second page of Exhibit C. And it says  
 22 "The real property herein, which is the subject of this  
 23 action, is at [REDACTED] Palm Island Boulevard." Do you know if  
 24 that's that the house -- the local house that Nancy and  
 25 Patrick share together or do you have any knowledge of



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1 that address?

2 A I don't recall the specific address, but that

3 sounds right. I have been to that house before, so that

4 sounds right.

5 Q Then I don't see the D.C. house listed.

6 All right; so let me ask this: To the extent

7 that Nancy's conversation with you in November 2023 turned

8 to her telling you that she was gonna use the pictures she

9 got off Patrick's phone to get her houses, is it your

10 understanding that that became a solely personal goal or

11 objective of Nancy Mace at that time, as opposed to a goal

12 or object that would be associated with her campaign or

13 her congressional office?

14 A Yes.

15 Q What did you understand or how did you

16 understand that Nancy wanted to use the information about

17 Patrick's -- or excuse me. The information about

18 photographs that she found on Patrick's phone -- let me

19 rephrase.

20 What was your understanding for how Nancy

21 intended to use the information about photos she found on

22 Patrick's phone in relation to quote getting her houses?

23 A Based on follow-up conversations, numerous

24 follow-up conversations, I understood that Nancy was going

25 to use all the information that she found as leverage to

1 gain 100 percent ownership of the Isle of Palms and

2 Washington, D.C. home.

3 Q Did Nancy ever task you with communicating with

4 Patrick Bryant about her possession of these alleged

5 photographs in asking you to essentially help her

6 blackmail Patrick into giving over 100 percent ownership

7 of the D.C. and South Carolina homes?

8 A Yes.

9 Q And would you agree with me that when she did

10 that, that was also in her personal interest as opposed to

11 the interest of her campaign or congressional office?

12 A Yes.

13 Q Do you remember, did she specifically say to

14 you "Please meet with Patrick and show him these images

15 and tell him I'll make them public if he doesn't give me

16 both houses"?

17 A Yes.

18 Q Did she say that subsequent to the Shiki

19 meeting?

20 A Yes.

21 Q Did you do as she asked?

22 A No. I did meet with Patrick. I did not say

23 that to him.

24 Q Right.

25 She asked you to meet with Patrick and to tell

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1 him "If you don't give me the houses" -- or excuse me.

2 "If you don't give me the full interest of the houses,

3 I'll make these pictures public." But you refused to do

4 that; correct?

5 A Yes. I met with Patrick; we had drinks on the

6 outside deck of his office in Mount Pleasant. And we did

7 discuss Nancy, but we also discussed other things.

8 Q Did you communicate -- this is gonna sound

9 convoluted, so I'm gonna try to ask this. Please forgive

10 me if I have to reask it once it comes out of my mouth.

11 I understand that Nancy asked you to convey --

12 well let's go back.

13 Would you agree with me that Nancy's request to

14 you to tell Patrick "If he doesn't give me the interest in

15 both houses, I'll make these pictures public," that was

16 effectively her effort to extort or blackmail Patrick; is

17 that correct?

18 A Yeah. And that was on March 27th, 2024.

19 Q How can you relate it to that date?

20 A Because I just remember -- I'm sitting here in

21 front of my computer, and I just punched in Patrick Bryant

22 on my scheduling. And the meeting with him on Shem Creek

23 about his son was May 30th, 2023, and the meeting at his

24 office was March 27th, 2024.

25 Q Okay. Give me one quick second here.

1 Apologize. My wife keeps trying to get in touch with me.

2 A Any time I tried to meet with Patrick was

3 always scheduled. I just remembered that all I have to do

4 is punch his name in and I can get those dates.

5 Q So this is the question I was trying to ask

6 before: When you met with Patrick, even though Nancy

7 asked you to convey her message of blackmail and

8 extortion, I'm clearly under the impression you did not

9 try to be her fixer in that capacity, but did you convey

10 to Patrick that she had asked you to do that and you had

11 refused?

12 A No. I didn't bring it up at all.

13 Q Okay.

14 You can see why that's like somewhat of a

15 distinction.

16 A I do.

17 Q "Hey, I'm not leveraging you, but let me tell

18 you, Nancy asked me to leverage you."

19 A In my career as a fixer, as you say, I'm often

20 asked to intervene in situations; and I'm always very

21 clear not to cross any legal boundaries. And in my eyes,

22 that was blurring some legal lines that I didn't want to

23 be part of. I met with Patrick, we discussed the breakup.

24 He kept talking about how he was still in love with her.

25 I remember that as clear as day. He did ask me if I knew

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1 where she was living, and I said "I don't know." And then  
 2 we started talking -- he asked how she was doing and was  
 3 concerned about her. I remember that. And then we were  
 4 mostly just sitting out on the deck talking about  
 5 business.

6 Q When you met with Patrick, did it -- go ahead.

7 A No; that's okay.

8 Q When you met with Patrick at this time, March  
 9 27th of 2024, I'm assuming from your testimony so far that  
 10 it seemed to you that Patrick was legitimately concerned  
 11 about Nancy, whereas Nancy was not legitimately concerned  
 12 for the well-being of Patrick.

13 A As -- yes; I guess that would be a good  
 14 summary. But I mean, as much as I can tell if someone's  
 15 concerned about someone else. I mean, he was asking about  
 16 her; and she had a very different tone, I guess is the  
 17 best way to say it.

18 Q Well -- and I guess a better way for me to ask  
 19 that question is: March 27th, 2024, was Patrick  
 20 expressing in any way ill will towards Nancy or the intent  
 21 to harm her or to in any way cause damage, discomfort, or  
 22 negativity towards her, I guess?

23 A Not at all. But -- I know, Doug, I'm not  
 24 supposed to -- I wanna be very clear here so we can have  
 25 some -- because it's not a question as -- Nancy was an

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1 emotional wreck at this time. She took the breakup  
 2 extremely hard. And I believe that Nancy believed the  
 3 things that she was saying.

4 Q Okay.

5 A If they were true or not; and I don't know if  
 6 they were true or not. And she believed it. She was  
 7 losing a lot of weight, she was getting what she called  
 8 stress tattoos. She was -- just because she wasn't saying  
 9 things like "How is Patrick?", she was emotionally  
 10 distraught at this point in the year. And in my view, her  
 11 emotional stability was crumbling. So I don't wanna make  
 12 it seem like she was just this machine that didn't care  
 13 about anything. She very much cared. But it was coming  
 14 across as erratic and unstable. Does that make sense? I  
 15 wanna -- don't get mad at me, Doug. I'm kidding. But she  
 16 did care, and that's the only way I can say that. That  
 17 make sense?

18 Q Yes.

19 MR. BREWER: Madam court reporter, let's  
 20 go off the record for a second.

21 (Discussion held off the record.)

22 BY MR. BREWER:

23 Q So Wes, you were telling me a minute ago that  
 24 this line of interaction with Nancy where she asked you to  
 25 go and essentially blackmail Patrick for her own personal

1 objectives regarding the house, that that ultimately led  
 2 to your dissociating from her campaign; and then you went  
 3 into some other stories about how she was emotionally  
 4 unstable or mentally unstable, whichever phrase you used.  
 5 So let me pick up there.

6 How did this series of communications starting  
 7 with "I found things on Patrick's phone" lead to talking  
 8 about houses, her seeming to be unstable, how did all that  
 9 relate to your comments about what led to be dissociating  
 10 from the campaign?

11 A I would say I left the campaign for three  
 12 primary reasons. The first is that -- I'll say four  
 13 things. The first being that I felt uncomfortable with  
 14 the things that Nancy was asking me to do, and I didn't  
 15 want to get in any legal trouble. That was the first  
 16 thing. The second thing is, which is the reason I'm being  
 17 subpoenaed and wouldn't provide a statement to you guys,  
 18 is I didn't wanna get sucked into this any further because  
 19 I saw what was coming. I saw that devolving into  
 20 something pretty bad. And being that I was Patrick's  
 21 friend, Nancy's friend, I saw that I was gonna get caught  
 22 in the middle; and I didn't want to be there, because I  
 23 have a business and family, too, and this was gonna get  
 24 ugly. The third reason is because of my own -- to be  
 25 honest with you, my own anxiety and stress levels. Her

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1 erratic behavior was causing problems in my own personal  
 2 life in that the constant phone calls, the constant  
 3 yelling, the erratic behavior was just too much. And the  
 4 fourth reason is she started tweeting and doing things on  
 5 the internet that I thought was unprofessional and people  
 6 were blaming me because I was her digital guy, and I  
 7 didn't want to be associated with what I found to be a  
 8 level of unprofessionalism on the internet.

9 Q Okay.

10 A So I cut ties with her.

11 Q Okay.

12 The first thing you mentioned that I wanna  
 13 kinda go down the road on is she was asking you to do  
 14 things that made you feel uncomfortable. We've discussed  
 15 her sharing the photos on Patrick's phone with you and  
 16 asking you to go blackmail him over the properties. Were  
 17 there other things she was asking you to do that made you  
 18 feel uncomfortable?

19 A No; I mean, it was primarily that. And you  
 20 used the word "blackmail." That was actually a word I was  
 21 using, too, internally when I was talking to people in my  
 22 company or talking to my wife and literally said, you  
 23 know, "Like she's asking me to blackmail someone." You  
 24 know, asking me do something that I thought was illegal.  
 25 And I'm no -- I'm no jurist. I have the -- I don't know

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1 if it was legal or not. But just by googling it, that's  
 2 what it looked like to me, so it had me extremely worried.  
 3 And then when I wouldn't do it, you know, I would get  
 4 yelled at. And the other thing I was concerned about was  
 5 I didn't know whether or not what Nancy was accusing  
 6 Patrick of happened or not. And outside of the blackmail  
 7 issue, there may be or -- I don't know. I don't know the  
 8 facts. And I still don't to this day. But there could be  
 9 victims here that Nancy wasn't alerting law enforcement  
 10 and, instead, using victims for her own personal gain.  
 11 And that was an ethical issue that I couldn't overcome. I  
 12 never saw any proof of anything. I saw pictures. In  
 13 those pictures, there was no proof of some of the things  
 14 that she was alleging. However, I didn't see everything.  
 15 So I was deeply concerned that there was no additional  
 16 legal measures being taken if she truly believed in what  
 17 she was saying.

18 Q Let me expound on that for a minute.

19 One, do you have -- Nancy, I know, has said  
 20 publicly recently that she has gone to authorities, has  
 21 gone to Alan Wilson, SLED, whatever it is she says. Do  
 22 you have any knowledge or indication when -- if, in fact,  
 23 she ever did what you thought was right and went to  
 24 authorities, do you have any knowledge when she ever did  
 25 that, if at all?

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1 A The only thing I know about is that shortly  
 2 after she came back from the Caribbean with Patrick and  
 3 some others, she told me she contacted Capitol Police, but  
 4 that was only for her own safety. As far as I know,  
 5 before I left, she had not contacted any law enforcement  
 6 regarding the other potential victims.

7 Q Do you remember when you left?

8 A It was shortly after the primary when she beat  
 9 Catherine Templeton, so that would've been in June of last  
 10 year. Probably July or early August. I can go back and  
 11 pull that one. We would have a record of that and the  
 12 contract. While we're talking, I'll just text someone and  
 13 find out.

14 Q Obviously, some of what you said is that using  
 15 information and pictures she got off Patrick's phone, if  
 16 that's blackmailing, that's certainly not part of her  
 17 official congressional responsibilities or her campaign  
 18 responsibilities; is that fair?

19 A Yes.

20 Q And I also understand you to say that because  
 21 Nancy seemed to be more concerned with how she could use  
 22 that information for her personal gain rather than trying  
 23 to ensure safety or rights of victims, that there's some  
 24 sense that her current declarations that she is for  
 25 victims is somewhat of a pretext.

1 A I don't know how to answer that.

2 Q I'll come back to that.

3 A Okay.

4 Q I'll come back to that question, because I  
 5 probably could've asked it better, to be honest.

6 A I know what you're trying to ask. And it  
 7 wasn't that your question was worded wrong, it's just that  
 8 I don't know the answer to it. Because it's my belief  
 9 that every single thing Nancy does -- every action, every  
 10 single action -- is all for personal gain. So I've never  
 11 -- so I don't know how to answer that question. I just  
 12 have certain beliefs about Nancy that kinda cloud -- you  
 13 know, I'd rather just stick to the facts that I know,  
 14 because my professional opinion of her is beyond the  
 15 facts.

16 Q Well in some ways, I may ask you to draw some  
 17 conclusions based on facts, but I'm not gonna ask you to  
 18 speculate about anything. I'll get back into that in a  
 19 minute.

20 Let me go a different direction for a minute.

21 Let me get back to the pictures and videos real quick.

22 Did Nancy ever discuss with you in detail how  
 23 she got the photos off Patrick's phone?

24 A She did, yeah.

25 Q Tell me -- let me ask this before I ask you

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1 what she did.

2 Did she ever use the term "hacking" or "I  
 3 hacked into Patrick's phone"?

4 A Yes.

5 Q Tell me what you remember her saying  
 6 specifically.

7 A Well for background, you need to know that  
 8 Nancy Mace is quite the -- when I use the word "nerd" or  
 9 "geek," it's always favorable, but a computer nerd or a  
 10 computer geek. She programs her owns bots, she sets up  
 11 Twitter burner accounts. This is kind of a thing she  
 12 does. She sits all night on the couch and programs bots,  
 13 because she's very, very computer savvy. She controls her  
 14 own voter database, she programs a lot of her own website,  
 15 she programs Facebook bots and Instagram bots and Twitter  
 16 bots. It's what she does for fun. And yeah, she told me  
 17 that she found stuff on his phone and then was able to  
 18 hack into -- as we're talking, it's jogging my memory.  
 19 This all started because she found that he was -- he had a  
 20 dating app. And -- had an account on a dating app. And  
 21 because she found that, she started thinking that he was  
 22 cheating on her, so she got into his phone. And then when  
 23 she got back from the Caribbean, she hacked into other  
 24 apps -- and I don't know what those other apps are -- and  
 25 seemingly, found hundreds of photos and videos.

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1 Q When she used the term "hacked" with you, was  
2 she clearly expressing to you that she gained access to  
3 his own phone without authorization or credentials?

4 A Yeah. I would be careful on the word "hack,"  
5 because people use the word "hack" in different ways. It  
6 doesn't mean that they're a computer hacker. It could  
7 just mean she found his user name and password and was  
8 able to access it. I wouldn't label it as hacking, but I  
9 do remember she used the word "hack" and I do remember  
10 that somehow she was able to access his phone and other  
11 items.

12 Q Did she give you any indication at that time  
13 that Patrick Bryant had voluntarily given her his  
14 passwords or otherwise given her voluntary access to his  
15 phone or devices?

16 A In fact, just the opposite. She got really  
17 upset once because he hid his phone -- not hid. He locked  
18 his phone away in a safe and, you know, she got into a big  
19 fight about why would he lock it in a safe if there was  
20 nothing to hide.

21 Q All right.

22 So let's go to -- give me one quick second.

23 I asked you a question earlier where I asked  
24 you if the photos that Nancy did show you -- I guess at  
25 Shiki and maybe at other times -- that she got from

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1 Patrick Bryant's phone, if she demonstrated or showed what  
2 she was alleging those photos showed. So let me -- I'm  
3 prefacing what I'm gonna ask you about based on what you  
4 said there. You said that Nancy said "Hey, Patrick's  
5 taking videos of women or pictures of women without their  
6 consent, blah, blah, blah." I guess I'm trying to figure  
7 out what was the story she was telling you that she was  
8 proposing those pictures showed and what did you not  
9 believe synced up about the photos that you saw and the  
10 story she was trying to tell?

11 A If by -- by "the story she's trying to tell,"  
12 do you mean her congressional testimony, her congressional  
13 tirade?

14 Q Let's go back to that. I'm gonna separate  
15 those two. That's a excellent question you asked. Let me  
16 ask a different question to help with that and baby-step  
17 that.

18 Nancy told a story in her congressional speech  
19 about her version of the history of all this. You, in  
20 some way, lived a portion of it.

21 A Yeah.

22 Q So when Nancy first spoke to you about what she  
23 found in November of -- was it November of 2023?

24 A Yeah.

25 Q November of 2023 at Shiki, is the story that

1 she was telling you at that time consistent with the story  
2 that she has been giving in her congressional floor  
3 speech?

4 A No.

5 Q So start there.

6 What was the distinction between what she was  
7 telling you in November '23 versus the story she's telling  
8 in the congressional floor speech?

9 A The only allocation was -- accusation, sorry,  
10 was that Patrick was in possession of pictures of naked  
11 women taken without their consent and without them knowing  
12 he still had them. There was never any discussion of rape  
13 or sex trafficking or anything beyond the fact that he had  
14 pictures of naked women taken without their consent.

15 Q Did Nancy, even when she showed you -- did  
16 Nancy ever report to you any story where she alleged she  
17 was somehow a rape or sexual assault victim?

18 A Not through Patrick. Only through her previous  
19 rape, which I think happened at The Citadel. Yeah; but no  
20 new rape.

21 Q And did Nancy -- I guess I'm still going back  
22 to November '23, or up to that time, had she in any way  
23 ever expressed to you that she thought she had been  
24 roofied or drugged in any way?

25 A No.

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1 Q And did she ever express to you that Patrick  
2 Bryant physically assaulted her or abused her in some way,  
3 even if nonsexually?

4 A Yes.

5 Q Okay.

6 Tell me about that.

7 A She had a number of bruises on her arm. I  
8 would call them like -- what would you call the end of  
9 your fingers? Fingertips. I would call them  
10 fingertip-size bruises on her forearm, about four of  
11 which -- above her elbow, little bruises on her arm about  
12 right here, and said that he grabbed her.

13 Q Okay.

14 All right; let me ask a different question real  
15 quick.

16 Remember I was asking you about the photographs  
17 that Nancy showed you, and then you indicated that her  
18 complaint was they were photographs of women without their  
19 consent. Did any of the photographs Nancy showed you  
20 support in any way that women who were being photographed  
21 were in the process of being sexually assaulted or raped  
22 while being photographed?

23 A No.

24 Q Did any of the pictures that you saw in any way  
25 depict or support that narrative, that these were women

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1 who were being raped, about to be raped, in the process of

2 being raped, or anything like that?

3 A No.

4 Q Did Nancy mention anything at that time --

5 still going back to this November '23 when she showed you

6 this pictures -- about John Osborne or Eric Bowman or

7 Brian Musgrave?

8 A She discussed Eric Bowman a number of times.

9 Especially as it relates to the picture of a passed-out  
10 girl on a couch, which I did see, with a blanket over her.

11 Q Yeah.

12 A That this had occurred at Eric Bowman's house.

13 Q So in that picture, by the way -- just so I can  
14 be clear -- it's literally just a picture of a girl on a  
15 couch with a blanket on her?

16 A Yes.

17 Q Can you tell from the photo, is the girl  
18 clothed, nude, or can you tell?

19 A She said she was nude. And I remember thinking  
20 like I can't see that.

21 Q Okay.

22 Are there any other men in the photograph?

23 A No. Let me go back. I don't recall. I don't  
24 think so. I remember her saying it was at Eric Bowman's  
25 house, but I don't remember Eric Bowman being in the

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1 picture, nor do I remember Patrick, but that's not to say  
2 they weren't. I just don't remember that.

3 Q Let me state it a different way.

4 You didn't see any men in the picture engaged  
5 in any sexual acts.

6 A Definitely not. No.

7 Q Okay.

8 A I had never heard Brian Musgrave's name until  
9 her speech in Congress. He was never mentioned before.  
10 John Osborne, I don't think she -- actually, I'm having a  
11 hard time remembering. Because SLED contacted me and  
12 questioned me. And I remember them telling me that the  
13 girl was John Osborne's girlfriend, but I don't remember  
14 Nancy saying that that was John Osborne's girlfriend. I'm  
15 a little cloudy there because -- yeah; I don't remember if  
16 she did or if SLED did, but I don't remember -- so I've  
17 known John for a long time. I've known John as long as  
18 I've known Patrick. I don't recall any accusations about  
19 John or Brian ever. It was always about Patrick and Eric.

20 Q To the extent that she was talking about Eric,  
21 was she talking about Eric in regards to any of the other  
22 photos or just the one with the girl covered up by the  
23 blanket?

24 A She talked about Eric a lot. Not only as it  
25 relates to the photos, but, you know, she -- she would

1 bring up Eric a good bit. She didn't like Eric at all.

2 Q Okay.

3 And what would she -- like to Eric Bowman, what  
4 would she say about him?

5 A Well just that he was a sleazeball and a bad  
6 influence on Patrick and that, you know, all Patrick's bad  
7 faults come from Eric. You know, after that Shiki  
8 incident -- I remember he was going to the Caribbean with  
9 Eric and with Zucker, Jonathan Zucker. She was going to  
10 the Caribbean and Eric was gonna be there, Jonathan  
11 Zucker; they had a boat. And I simply asked her "If you  
12 think Patrick's dangerous, you think Eric's dangerous, why  
13 are you going to the Caribbean with them?" Like she never  
14 once talked about Eric.

15 Q Did she ever show you anything that would  
16 support Eric Bowman committing some type of sexual assault  
17 or rape or anything like that against a woman?

18 A No.

19 Q Did she ever show you any -- well did she ever  
20 discuss with you the allegation that Patrick Bryant and  
21 Eric Bowman broke into a woman's residence, house, or  
22 apartment, and took turns filming her while the other one  
23 raped her?

24 A No. Let me just state clearly -- and I know  
25 you're gonna ask these all individually, and that's

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1 fine -- she never once took the leap from he's taking  
2 creepy pictures of women without their consent to any kind  
3 of violence or rape.

4 Q Okay.

5 A Ever. Patrick, Eric, or anyone else, ever.

6 Q Maybe this is a good way to ask that question:  
7 When is the first time that you ever heard the allegation  
8 that Patrick Bryant or Eric Bowman were somehow engaged in  
9 sexually assaulting or raping or sexually being violent to  
10 women?

11 A In her congressional floor speech.

12 Q While you were still meeting with Nancy and  
13 working with her, did she mention anything about Airbnbs  
14 and Patrick Bryant?

15 A Only that they were Airbnb'ing the D.C. place  
16 and the IOP place. I mean, I rented the D.C. place from  
17 'em I think twice on Airbnb. Like only those discussions.

18 Q Did she ever reference video cameras at any  
19 Airbnbs associated with Patrick Bryant?

20 A No.

21 Q Did Nancy talk to you about her relationship  
22 with [REDACTED] at all?

23 A No.

24 And by the way, your previous question about  
25 when did we quit working with Nancy, we notified her on

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1 August 8th that we were --

2 Q Okay; gotcha.

3 A Yeah.

4 Q Thank you.

5 So did Nancy ever show you any videos that she

6 allegedly hacked or obtained off Bryant's phone without

7 permission?

8 A No; just some photos.

9 Q Did you ever have knowledge of Nancy working

10 with any authorities about the photos or videos she

11 obtained off Patrick's phone? SLED? Any other law

12 enforcement agency.

13 A No. In fact, just the opposite. I think she

14 was not talking to them about it. She told me she had

15 talked to Capitol Police.

16 Q That's the last you ever heard about that.

17 A Yes.

18 Q So if I understand that correctly, from the

19 time you first heard about the photos or videos in

20 November of '23 to when you terminated your campaign

21 relationship on August 8th of 2024, the only thing you

22 ever heard from Nancy Mace regarding her going to law

23 enforcement regarding Patrick Bryant, Eric Bowman, photos

24 and videos that she got off Patrick's phone, that would've

25 only been relating to her going to Capitol Police to try

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1 to arrange for some kind of security for herself?

2 A Yes.

3 Q And what was the security she was seeking for

4 herself from Capitol Police?

5 A I don't recall. Just security. I mean, she

6 was afraid for her safety.

7 Q Was she insinuating or alleging that Patrick

8 might come see her in D.C.?

9 A If I remember specifically, she would tell me

10 "Don't ever tell Patrick where I'm staying." So I think

11 she was fearful of retribution, or at least, you know,

12 acting like she was fearful of it.

13 Q Did you have experiences with Nancy -- I wanna

14 be careful how I'm gonna ask you this question because I

15 wanna give you the leeway to answer it as you see fit;

16 right? But did you ever have experiences with Nancy where

17 she would tell you things that the facts and records that

18 you were experiencing did not support?

19 I see your face. Let me scratch that and ask

20 something else.

21 A Nancy's a chronic liar.

22 Q That's what I was gonna ask.

23 Did Nancy make up facts?

24 A All the time. Her car was keyed, her tires

25 slashed, someone vandalizing her house. She likes to take

1 kernels of truth and embellish them.

2 Q Would she acknowledge that she would take

3 kernels of truth and embellish them? Like was she aware

4 that she was doing it or do you think it was more like a

5 compulsive-liar type thing where she doesn't know she's

6 doing it?

7 A I believe -- look, I can't say for truth. I

8 can only tell you what I believe, and I believe that Nancy

9 Mace has a hard time telling what's reality and what's

10 not. I believe that Nancy Mace is a chronic liar who

11 constantly plays the victim card for her own benefit, and

12 I would catch her in lies all the time.

13 Q And if you caught her in lies, would you

14 confront her about those lies?

15 A No; because she sees black helicopters

16 everywhere. Everybody's out to get her. Her campaign

17 managers. You know, she -- she -- she'd just talk bad

18 about everybody, hates everybody, everybody's out to get

19 her. She's -- she's just not stable. I don't know how

20 else to say it.

21 Q Has that been the case throughout your dealings

22 with her from the very beginning of her campaign or did

23 she increasingly become unstable over time or how -- or

24 tell me about that.

25 A I mean, it went from -- no, she was always a

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1 little bit like that. She would hand me polling with like

2 parts of the polls blacked out, like a CIA top-secret

3 document you see on movies; right? So she's always had

4 that kinda like everybody's-out-to-get-me-black-helicopter

5 mentality, but it got progressively worse. Like her last

6 campaign manager, she would accuse of stealing data. The

7 previous one before that, often she was accusing of

8 stealing stuff. And over the years, she devolved. And it

9 got really bad during the primary against Catherine where,

10 you know, she would call and say "Well I just got another

11 stress tattoo," and then she was also crying.

12 Q I've heard you mention a stress tattoo. What

13 is a stress tattoo? I've never heard that term.

14 A Well, it's just a tattoo. She would say it

15 helps her with her stress. I never heard that term,

16 either. That's what she called 'em.

17 Q Huh.

18 Do you know what she would get stress tattoos

19 of?

20 A No. I think words.

21 Q Gotcha. Like?

22 A I don't know. I always found it to be weird,

23 so I didn't ask a lot of questions. But she was -- and I

24 wanna be careful the way I say this, because I don't think

25 a lot of this was premeditated, nor do think a lot of it

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1 was like on purpose. I think she believed Patrick was  
 2 cheating on her. I believe that she believed that he had  
 3 a bunch of creepy pictures, and I believe that that pushed  
 4 her over the edge to start making very emotional and  
 5 erratic decisions; and I believe that it started impacting  
 6 her health, such as not eating, drinking too much, and  
 7 losing a ton of weight. And I think that she has  
 8 consistently devolved emotionally since then. And --  
 9 which was one of the reasons I terminated my relationship  
 10 with her, because it started getting too bad.  
 11 Q Gotcha.  
 12 So this is another question I had.  
 13 Do you remember if you are familiar with  
 14 Nancy's floor speech from January of 2025?  
 15 A Yeah.  
 16 Q She rehearsed a series of political bills that  
 17 she was planning to introduce into Congress or had  
 18 introduced into Congress. Do you remember that part of  
 19 her speech where she referenced those?  
 20 A Yes.  
 21 Q And I have marked that as an exhibit. We can  
 22 pull it up if we need to, but I wanna ask a generalized  
 23 question without getting into weeds.  
 24 I'm assuming, based on what you do, if Nancy,  
 25 as part of her congressional function, was introducing

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1 bills that she wanted to mention in a floor speech, what  
 2 she would've done is made both her congressional office  
 3 and such campaign aware of it so that you guys could  
 4 contribute with the digital strategy of marketing these  
 5 plans, marketing it to her constituents as "Look what a  
 6 good job I'm doing." Is that fair?  
 7 A We had a weekly call every week with her chief  
 8 of staff, Lorie Khatod -- L-o-r-i-e, K-h-a-t-o-d -- called  
 9 the pineapple call. Never understood that one. It was  
 10 always on the calendar "weekly pineapple call." But -- I  
 11 don't know what "pineapple" was code for; but on the  
 12 weekly pineapple call with her chief of staff, her  
 13 consultant, Doug Stafford; her campaign manager, John  
 14 Mason Long; and Nancy, and we would discuss everything  
 15 going on with the official office and everything going on  
 16 with the campaign so that both could be coordinated the  
 17 way it needed to be coordinated.  
 18 Q As of August 2024, had you ever understood or  
 19 heard any reference to Patrick Bryant, Eric Bowman, sexual  
 20 assault, assault against women, rape, in any way being  
 21 part of her campaign strategy at that time?  
 22 A No.  
 23 Q If Nancy Mace was -- so now let me ask a  
 24 slightly different question, but you'll understand it.  
 25 If prior to August of 2024, Nancy Mace had

1 spoken, e-mailed, or published to anyone that Patrick  
 2 Bryant and Eric Bowman were sexually assaulting women or  
 3 were breaking in to their apartment to film the sexual  
 4 assaults of women, that was in no way related to her  
 5 campaign or her congressional office as of August 2024 to  
 6 your knowledge.  
 7 A Yes.  
 8 Q To go through the names you just gave me, Lorie  
 9 Khatod was her chief of staff?  
 10 A Yes.  
 11 Q Is that still her chief of staff, or has that  
 12 changed?  
 13 A I've heard that they parted ways.  
 14 Q Do you know when Lorie parted ways with her?  
 15 A I don't.  
 16 Q Do you have contact information for Lorie  
 17 Khatod?  
 18 A I don't think I do. I think I got a phone  
 19 number. Yes; her e-mail address looks like it was a Nancy  
 20 Mace e-mail address, but I do have her phone number if  
 21 it's still the same. And that phone number is  
 22 [REDACTED]  
 23 Q [REDACTED]  
 24 A Yes.  
 25 Q Are you aware, did Nancy ever speak with Lorie

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1 about Patrick Bryant and Eric Bowman related to the issues  
 2 we're hearing in her floor speech now?  
 3 A I do not recall.  
 4 Q Was Doug Stafford, was that her -- what was his  
 5 position again?  
 6 A He was the general consultant.  
 7 Q General consultant.  
 8 Do you know, is Doug Stafford still with her  
 9 office or campaign?  
 10 A I do not know, but I assume so.  
 11 Q And what about John Mason Long? What was his  
 12 position again?  
 13 A He was the campaign manager.  
 14 Q Is he still with her?  
 15 A No.  
 16 Q Do you have contact information for John Mason  
 17 Long?  
 18 A I do. In fact, I just saw him on Friday. His  
 19 phone number is [REDACTED]  
 20 Q Okay.  
 21 Do you know, did Nancy discuss Patrick Bryant  
 22 and any of these allegations that we've been discussing  
 23 with Doug Stafford in any way?  
 24 A I do not recall, but it would be shocking to me  
 25 if she did not.



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1 Q Okay.

2 What about Dan Hamlin? Do you know if Nancy

3 Mace discussed Patrick Bryant and Eric Bowman and these

4 allegations with Dan Hamlin?

5 A I believe -- you would have to go check the

6 dates, but I believe Dan was already gone by the time this

7 all came up.

8 Q Okay.

9 A I don't remember when Dan left and Lorie came

10 on. But if my memory's correct, Dan was already gone.

11 Q Okay.

12 A But I could be wrong there.

13 Q Did any other consultants or campaign staff or

14 political professional express any concern to you about

15 Nancy's behavior or stability before you left the

16 campaign?

17 A Oh, yeah. John Mason Long, she thought -- they

18 had it out. Doug Stafford and I talked about it all the

19 time. Everybody in my office that she had to work with.

20 Q Generally, what were the conversations coming

21 from other people? What were they saying?

22 A That she is losing her mind, that she's

23 erratic. That what was already a little erratic has gone

24 off -- you know, gone off a cliff. I mean, there was even

25 a lot of conversation about us being concerned for her

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1 safety. Like I was concerned about it. I mean, I was

2 very concerned about it. To this day, I'm still concerned

3 about it.

4 Q When you say "concerned for her safety," you

5 mean within terms of like self-harm or something like

6 that?

7 A 100 percent; yeah.

8 Q Are you aware of anyone else that Nancy Mace

9 privately communicated with about her allegations of

10 criminal conduct and Patrick Bryant? Her sister, her

11 mother, other members of Congress?

12 A Not that I'm aware of. Nancy doesn't have a

13 lot of friends. She's not close with a lot of people.

14 Q Right.

15 Has Nancy ever discussed -- let's do this. Let

16 me take a break for a minute.

17 (Discussion held off the record.)

18 BY MR. BREWER:

19 Q Wes, do you recall -- I showed you a lawsuit

20 earlier where Nancy Mace sued Patrick Bryant over real

21 estate. Do you remember her attending a mediation in May

22 of 2024 related to that suit?

23 A I don't remember -- that's a good question. I

24 don't remember a mediation. I remember her talking to

25 numerous lawyers about it because she kept talking about

1 how she wanted to use these pictures to get the houses and

2 that she was going through all these different attorneys

3 and some of them wouldn't -- wouldn't work with her. But

4 I don't remember a specific mediation.

5 Q Is the reason that she was telling you that

6 these lawyers wouldn't work with her is because she was

7 potentially asking them to do something illicit in terms

8 of --

9 A I don't think she ever said that, but that was

10 what I was taking away from it.

11 Q Do you know, in any way did Nancy ever use any

12 congressional or campaign funds to pay for these lawyers

13 to handle her personal business?

14 A I don't know.

15 Q Okay.

16 Do you know in any way -- this is a slightly

17 different question. You probably still won't know.

18 Do you know in any way how these lawyers were

19 getting compensated?

20 A I do not know. I was under the assumption she

21 was paying them, but Nancy doesn't have a lot of personal

22 money so I do not know.

23 Q So let me ask a different question: Do you

24 recall Nancy Mace settling the real property dispute with

25 Patrick Bryant?

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1 A Only from what I read in newspapers.

2 Q Oh. Gotcha.

3 A That happened well after I was gone.

4 Q Okay.

5 A Isn't it true that she settled those about a

6 week before her congressional --

7 Q No. I think what you're confusing, if I'm

8 right, there was a settlement agreement in or around May

9 of 2024. But the properties -- some of the properties

10 sold at a later date, which is probably what you're

11 thinking about, because that would've been public record.

12 You know, the settlement's like, hey, we're gonna sell

13 this property; here's how we're gonna split the proceeds.

14 Properties have to sell. So the property -- what you're

15 referring to, I think, were some articles where the

16 properties did sell because the reporters are watching.

17 A Got it. Gotcha.

18 I was under the assumption when I left in

19 August that those properties were still -- still being

20 mediated, but I did not know that.

21 Q That's why -- I'll ask this prophylactic

22 question, then: Did Nancy ever express any unhappiness or

23 any personal dissatisfaction with the way the real estate

24 properties that she and Patrick shared were being divided?

25 A All the time. She wanted 100 percent



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1 ownership. And she would say it all the time. And that  
2 she was going to -- if she did not get 100 percent  
3 ownership, then she was going to ruin him and Eric. She  
4 never mentioned John or Brian, but that she would  
5 absolutely ruin them with the information that she got  
6 about 'em.

7 Q Why was she insistent on ruining Eric's life  
8 with information she had if Patrick didn't agree to give  
9 her 100 percent of the properties she and Patrick shared?

10 A I don't know. I was just always under the  
11 impression that she hated Eric, but I don't know.

12 Q Got it.

13 Okay. Let me -- I'm gonna frame a time frame  
14 here. From November 2023 -- which is the meeting at Shiki  
15 we discussed earlier -- to your departure on August 8th,  
16 2024, was there ever any discussion of a political  
17 campaign, Nancy Mace For Congress political campaign or  
18 for office itself for Congress, was there ever any  
19 discussion about Nancy campaigning on Patrick Bryant, Eric  
20 Bowman, John Osborne, or Brian Musgrave being sexual  
21 predators in some way?

22 A No.

23 Q Between November 23, 2023, and August 8th,  
24 2024, if Nancy had published to anyone allegations that  
25 Patrick Bryant, Eric Bowman, John Osborne or Brian

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1 Musgraves in any way contributed to the sexual assault of  
2 women, would those comments in any way be related to her  
3 congressional office and its responsibilities?

4 A No.

5 Q And to make sure we're clear about what you  
6 said earlier, you can say that because if statements about  
7 Patrick Bryant, Eric Bowman, John Osborne, or Brian  
8 Musgraves being involved in sexual assault was part of her  
9 congressional responsibilities, you would've heard about  
10 it at the pineapple meetings that you had every Monday.

11 A Yes.

12 Q To state that yet a different way, if you  
13 didn't hear about it during the pineapple meetings that  
14 she had every Monday, it wasn't part of her congressional  
15 responsibilities or campaign.

16 A Yeah; they were on Fridays. But if she were  
17 planning on that sort of a move, then I would've heard  
18 about it.

19 Q Between November 2023 and August 8th, 2024, was  
20 Nancy Mace protecting women against voyeurism, recordings,  
21 home cameras? Was that in any way part of her detailed  
22 congressional responsibilities during that time frame?

23 A Not that I recall. I mean, she always -- you  
24 know, because of her first -- Nancy was raped -- Nancy  
25 says she was raped before when she was in college, I

1 believe. So that has been an issue that she was

2 passionate about, but I never heard of the voyeurism and  
3 these other issues.

4 Q When you met with Nancy in November 2023 at  
5 Shiki, was there any discussion about her writing any kind  
6 of bills or legislation in any way related to the  
7 photographs she was showing you from Patrick Bryant's  
8 phone?

9 A No. She specifically stated that she was going  
10 to use the information she found for -- to gain ownership  
11 of the two properties.

12 Q Did Nancy ever tell you -- did she ever express  
13 that she had a legitimate ownership interest in 100  
14 percent of those properties or just that she wanted them  
15 and, therefore, was gonna use this information to obtain  
16 that result?

17 A That she owned half of each and that she was  
18 going to take 100 percent ownership of them using the  
19 materials she found on Patrick's phone and computer.

20 Q The question I'm asking is a small distinction.

21 Did she have any legitimate belief that she was  
22 actually legally entitled to 100 percent of those  
23 properties?

24 A No. No; she was going to use -- and her words  
25 -- the materials as leverage. "He's gonna give 'em to me

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1 or I'm gonna ruin him."

2 Q Yeah.

3 In your experience, did Nancy ever discuss  
4 using leverage, blackmail, reputational harm, or public  
5 pressure against her political or personal adversaries?

6 A Ask that question again; I'm sorry.

7 Q We talked about these tactics of Nancy using  
8 dirt for leverage. Did Nancy use that sort of leverage  
9 and reputational harm against other people?

10 A Yes.

11 Q Do you have specific recollection of examples?

12 A During the 2024 primary, she was able to find  
13 some information about Catherine Templeton's son, and she  
14 leaked that information to the press and asked us to  
15 utilize it, use it in campaign marketing; and I told her  
16 that I didn't wanna do it and I thought it was beneath her  
17 and that nobody cared about what some kid was doing.

18 Q Do you have any specific recollections of those  
19 types of tactics?

20 A Not off the top of my head.

21 Q No worries.

22 I know you probably listened to Nancy Mace's  
23 floor speech in January of 2024 that named Patrick Bryant  
24 and Eric Bowman and Osborne as predators. Did you ever  
25 read the speech, as well?

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1 A I've read parts of it, but I don't think I read  
2 the whole thing.

3 Q Are the allegations -- Nancy made efforts in  
4 that speech to tie what she was doing in that speech to  
5 her congressional activities in office.

6 A Uh-huh (witness indicated an affirmative  
7 response).

8 Q Did you ever hear the issues she raised in this  
9 speech being related to her official role in Congress or  
10 any responsibilities she was undertaking in Congress  
11 during the time of November 2023 to when you left in  
12 August of 2024?

13 A No.

14 Q Do you ever hear from anybody in Nancy's orbit  
15 after you left from August 2024 through the present?

16 A No.

17 Q Okay.

18 Let me ask about these names and ask if you've  
19 heard anything from Nancy about these people.

20 Did Nancy ever mention anything to you about a  
21 lady named [REDACTED] or [REDACTED]? It's [REDACTED], she goes by  
22 [REDACTED].

23 A No. I mean, I know who she is, but no.

24 Q How do you know who [REDACTED] is?

25 A Because I later found out that that was John

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1 Osborne's girlfriend, supposedly the girl on the couch.

2 Q How did you find that out?

3 A I don't recall. It could've been that SLED  
4 conversation.

5 Q Okay.

6 A Yeah.

7 Q While we're on that topic, did SLED relay to  
8 you what Nancy had told SLED?

9 A No.

10 Q Did SLED ever show you anything? Pictures,  
11 videos, anything like that?

12 A No.

13 Q Is the conversation you had with SLED tracking  
14 with what we've discussed today or is there things in the  
15 conversation with SLED that we haven't discussed yet?

16 A No, it tracks.

17 Q Did Nancy Mace ever mention a lady by the name  
18 of Katherine Cockman to you?

19 A No; I've never heard that name.

20 Q Did Nancy ever mention someone by the name of  
21 Sam Staley to you?

22 A I don't recall, but I know Sam from other  
23 things; but I don't recall if she talked about Sam or not.

24 She probably talked about Sam, but I would've known Sam  
25 prior.

1 Q Gotcha.

2 Did Nancy in any way discuss any conversations  
3 she might've had with Sam Staley about Patrick Bryant in  
4 any way?

5 A No.

6 Q Let me ask now -- so I've got an exhibit I've  
7 marked, which is Exhibit E, I wanna show you really quick.  
8 I wanna get your understanding for how all this works.

9 What I'm showing you that has been marked as  
10 Exhibit E -- this isn't mine, but I actually received the  
11 same thing. I get inundated with these WinRed texts. I'm  
12 thinking about changing my phone number, in fact. And one  
13 of them that came out was this.

14 A It's not coming up. I see the PDF, but I don't  
15 see what's in the PDF.

16 Q That's weird. Let me try again. Yeah; see it  
17 paused it, so it was blacking out the screen. Give me  
18 another second. Not sure why it was doing this.

19 A Doug, you sent those to me, didn't you?

20 Q Can you see it now?

21 A Yes.

22 Q How do these text messages or these fundraising  
23 messages for the campaign work? Like who's responsible  
24 for these? Who sends 'em out? Who drafts all this?

25 A The answer is it's dependent upon the day. In

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1 other words, after we terminated our contract, then it was  
2 a different firm; but this is the kind of work that my  
3 company does. So prior, the answer would be us.  
4 Afterward, it'd be whoever she's using now that we no  
5 longer work with her.

6 Q And how does this work, like when these texts  
7 go out? Like do you guys buy phone numbers and send these  
8 texts out and you just link it back to these WinRed  
9 platforms for fundraising? How does that all come  
10 together?

11 A Most of them are done through different kind of  
12 list agreements. We don't buy numbers. Typically, if you  
13 received it, you donated to a different Republican; and  
14 then we shop around those different lists. I told you  
15 that I have a fourth company called RCL. That's all that  
16 company does, is it rents data to different political  
17 campaigns and organizations. So it's -- to answer how  
18 does this work would take me an hour in itself; but  
19 basically, it's a -- a company such as ours comes up with  
20 a concept, sends 'em to a campaign, campaign approves, and  
21 then we start sending it around to different lists.

22 Q Got it.

23 So if I wanted to find out like who the new  
24 Push Digital was basically, for this, I would need to ask  
25 Nancy Mace who their campaign digital marketing team or

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1 consultant is?

2 A I mean, you could; but you showed me an exhibit

3 earlier with some FEC information. You can go to that

4 same FEC site and find out, you can look at her

5 expenditures and find out who her vendors are.

6 Q Okay; gotcha.

7 Then I wanna show you -- I have a compilation

8 of tweets. Let me go to a different page here. And this

9 is Exhibit F. I'll pull that up. It's taking a second

10 because it's so large. This is a Word document, but I

11 think we turned it into a PDF, but it's just a collection

12 of tweets just leading up to and then after the

13 congressional floor speech from May of 2024. Some of

14 these, I'm sure you've seen. You're welcome to flip

15 through 'em at your leisure. I can make 'em bigger for

16 you.

17 Do you know, does Nancy write these tweets

18 herself or does someone on her staff do this for her?

19 A Both. I'm trying to look up the girl's name

20 right now. I'm sorry. Give me two seconds. Okay; so --

21 I can't find her name. So Nancy has a new person that

22 works for her now. I can't find it. It's gonna take me a

23 little bit of time, but I can find the name of it. She

24 has a young woman who is her new communications director

25 in her official office who has been handling her Twitter

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1 account.

2 Q Someone that goes by the name of Sydney, maybe?

3 A I think that's correct. Is it Tiffany? She

4 tweeted it the other day, "My new comms director."

5 Q That would be since -- these tweets are like

6 back in -- these are February '25 --

7 A No, no, no. She was doing the campaign stuff.

8 Now she's got an official comms director. She started

9 working with her right before we left. I think her name

10 is Claire. Anyway, so Nancy writes a lot of 'em herself.

11 This new girl writes 'em, and then a lot of what she

12 tweets out these days is from ChatGPT.

13 Q Which one?

14 A Go down, go down, go down; that one.

15 Q "God placed a burden in my path. Not to crush

16 me, but to ignite"?

17 A Yeah; that one's ChatGPT.

18 Q How can you tell?

19 A See that long dash? It's called a em dash, e-m

20 dash. Normally, people don't use that, but ChatGPT does.

21 Q Interesting.

22 So does she ask ChatGPT to come up with the

23 tweets, and then she cuts and pastes them in the Twitter?

24 A Yeah; a lot of 'em. Sometimes she writes 'em

25 herself. But what she'll do is she'll write a bunch of

1 'em, and then she'll put 'em all in ChatGPT and then say

2 "Hey, give me some more tweets that are like this."

3 Q Wow.

4 A Definitely.

5 If you see the Oxford comma being used a lot.

6 Q I'm a lit major, so you are -- boy, you're

7 taking me back.

8 A So that em dash and the Oxford comma are the

9 two biggest signs of ChatGPT.

10 Q That's so funny.

11 A The things you learn.

12 Q I've learned a lot of things, but that is

13 probably the most-interesting thing I've learned all day.

14 Okay; this account Rep Nancy Mace, is that

15 associated with her congressional office or her campaign

16 office?

17 A That's her congressional office.

18 Q And so the account associated with her

19 campaign, that just says Nancy Mace or Nancy R. Mace or

20 something like that?

21 A I think it's Nancy Mace, but that was the

22 account we used to control. We never had this one.

23 Q When you were doing the campaign, it was just

24 as Nancy Mace, basically.

25 A Yeah.

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1 Q Okay. Gotcha; gotcha; gotcha.

2 So is there actually a division of labor that's

3 kind of usually well respected in terms of what person

4 being paid money from what accounts are using -- excuse

5 me; let me rephrase that.

6 Is there usually a respected division of labor

7 about Nancy Mace's official congressional Twitter account

8 being populated or authored by Nancy or someone else being

9 paid by the congressional office as opposed to there being

10 a cross-filtering where maybe someone from the campaign's

11 also running her official account or -- do you understand

12 what I'm asking? Is it all hands on deck between the

13 campaign and congressional office about which platforms

14 are being used and who's authoring what?

15 A Yes.

16 Q So it could be a mixup. You could have people

17 from the campaign paid by the campaign using the official

18 account like it's official.

19 A Yes.

20 Q Okay.

21 When you're in someone's office, is it typical

22 for most candidates to respect the line between

23 congressional mediums of communication versus campaign

24 mediums of communication?

25 A Yes. There's supposed to be. We demand it

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1 when we work with a candidate. We never touch their  
 2 official stuff.  
 3 Q Right.  
 4 A Which is why we have that whole separate  
 5 company that does franking. We have a complete separation  
 6 of church and state here to never touch.  
 7 Q Right.  
 8 I have some notes here, so give me two seconds.  
 9 I've showed you this document with all these  
 10 tweets, and I know that you are an active Twitter user. I  
 11 don't use Twitter a ton; but in researching this case, I  
 12 certainly know that you have an active presence on Twitter  
 13 and that you did around the time that all these tweets in  
 14 Exhibit E or F were published. So you do recall seeing a  
 15 lot of these; is that correct?  
 16 A Yes.  
 17 Q Did the sentiments and positions being tweeted  
 18 from just leading up to and after the floor congressional  
 19 speech in January 2025, and then for about a month or so  
 20 after, were these topics being discussed in your Friday  
 21 pineapple meetings between November 2023 and August 2024?  
 22 A No.  
 23 Q Okay.  
 24 Let me check some of my notes here. We're  
 25 moving right along, so thank you so much. One minute, and

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1 I'll go ahead and check notes real quick. I might be  
 2 farther along.  
 3 (The deposition took a short recess.)  
 4 BY MR. BREWER:  
 5 Q All right.  
 6 Based on the fact that you have had a history  
 7 of communications with Nancy Mace about some of the topics  
 8 that she expressed on the floor in January of 2025, do you  
 9 have an opinion based on your prior communications with  
 10 Nancy Mace about the veracity or truthfulness of the  
 11 allegations she made in her congressional floor speech  
 12 about Patrick Bryant, Eric Bowman, John Osborne, or Brian  
 13 Musgraves?  
 14 A I don't believe a word that comes out of Nancy  
 15 Mace's mouth about anything. And that has nothing to do  
 16 with this specific incident. I just believe that Nancy  
 17 Mace will say and do anything for personal and political  
 18 gain. And I also believe that had she believed that there  
 19 was these larger acts of rape and sex trafficking  
 20 occurring, that she would've talked to me about it. And  
 21 that is not to belittle the accusations that she did bring  
 22 up, such as taking pictures of women without their  
 23 consent, but that is a far cry from sex trafficking.  
 24 Q Got it.  
 25 A And I don't know if he took pictures of women

1 without their consent. But that was the only thing that  
 2 she ever discussed with me; and as of August 23rd -- or  
 3 I'm sorry; August 3rd, or whatever that date was that we  
 4 terminated the contract, that was the only thing that she  
 5 had ever discussed.  
 6 Q Do you have prior experience of Nancy using the  
 7 powers of her congressional office as a pretext for  
 8 personal gain, personal financial gain, or personal  
 9 motives?  
 10 A Personal financial gain? I don't think so.  
 11 But she used her power of office all the time for personal  
 12 reasons. I mean, the other day she got pissed at a guy  
 13 named Steven Ryan who worked with the communications  
 14 director for the sheriff of Dorchester County and called  
 15 the sheriff demanding that he fire the guy a month before  
 16 the guy's wedding for no reason saying that she demands it  
 17 as the congresswoman and that her congressional office  
 18 would never work with the sheriff again. That's the shit  
 19 she pulled.  
 20 Q What was the personal objective, you think?  
 21 A Ego.  
 22 Q Okay. Got it.  
 23 But in like that instance, you can't think of  
 24 what the personal benefit to her is other than flexing.  
 25 A Yeah.

1 Q Got it. Got it.  
 2 A The answer is I don't know. I could only tell  
 3 you what I've seen. And what I know is that she believed  
 4 -- and she did believe -- that Patrick cheated on her and  
 5 had pictures of women without their consent; and she sat  
 6 on that information for well over a year, did not wanna  
 7 contact authorities, and asked me to blackmail Patrick  
 8 Bryant.  
 9 Q Yep.  
 10 Did you see the recent interaction with her and  
 11 this guy James McIntyre about a handshake incident?  
 12 A Yeah.  
 13 Q And did you have any knowledge about that?  
 14 A I mean, there's a number of things. Are we --  
 15 we're not talking about the makeup place.  
 16 Q No; James McIntyre, the --  
 17 A The guy in the bathroom at the Capitol?  
 18 Q Yeah. She claims she was assaulted from a  
 19 handshake by a guy with some kind of gay rights --  
 20 A Yeah.  
 21 Q -- orphanage, or something like that.  
 22 A Yeah.  
 23 Q I didn't know if you had any information about  
 24 that at all.  
 25 A I don't have any information, but it's typical

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1 Nancy. She's always the victim. She'll use anything to  
2 be able to say that she's the victim. That someone hurt  
3 her, someone keyed her car, someone slashed her tire,  
4 someone vandalized her house, someone took a picture of  
5 her kid, someone harassed her at a makeup place. It's --  
6 every day there's -- someone else is doing something.  
7 She's always the victim of something. I've never met a  
8 human being that was always such a victim.

9 Q Okay; give me one quick second. I'm almost  
10 done. I might have one more line.

11 Wes, let me ask you a couple questions.

12 Since your breakup professionally with Ms. Mace  
13 in August of 2024, have you been under the impression or  
14 do you have information that Nancy is in any way trying to  
15 target you or your businesses in retaliation for some  
16 perceived sleight or disagreement with your office?

17 A Not yet. But that's why I didn't wanna have to  
18 do this. In fact, that's why I didn't wanna have to talk  
19 to you, Barrett. I mean, you know, you had to subpoena me  
20 because I didn't want to have to do this. But my guess is  
21 that she's going to seek retribution, which is what I  
22 wanted to avoid.

23 Q No one wants to be involved for that very  
24 reason; right?

25 A Yeah.

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1 Q Have you, in the time that you dealt with  
2 Nancy, ever known her to get personally involved with any  
3 type of state-level law enforcement or SLED investigations  
4 as part of her role at Congress?

5 A I don't think so. Or at least I don't recall.  
6 I mean, I worked with her for years, and every week it was  
7 something different; so it could've been, but I don't  
8 recall anything like that.

9 Q To go back to something you said earlier, if  
10 the statements and allegations that Nancy Mace has levied  
11 against Patrick Bryant, John Osborne, and Eric Bowman, if  
12 they -- as I understand the history, those allegations  
13 started with Nancy saying "Because I didn't get the two  
14 houses, I'm gonna use the information about what I got off  
15 Patrick's phone" when she hacked his phone to ruin them.  
16 The endgame of that was the floor speech in Congress,  
17 based on what she told you?

18 A That's what I believe; yes.

19 Q And so the original undertaking was not a  
20 congressional office motive, it was a personal motive in  
21 relation to her retaliation for not getting the financial  
22 and real property assets she demanded.

23 A That is my belief. My belief is that she did  
24 exactly what she told me she was going to do.

25 Q That's your belief based on what she told you,

1 in other words.

2 A Nancy Mace told me that she was going to use  
3 this information to gain 100 percent ownership of these  
4 houses; and if that she didn't get them, she was going to  
5 absolutely ruin the reputations of Patrick Bryant and Eric  
6 Bowman. She didn't ever mention John Osborne, she didn't  
7 mention Brian Musgraves. I don't know how they got dipped  
8 in this whole thing. But she told me she was going to do  
9 that to Patrick and Eric. And in my eyes, that's exactly  
10 what she did.

11 Q Was it your understanding that Nancy Mace had  
12 gotten 100 percent ownership of the real property, that  
13 she would've continued to sit on the information about  
14 what she quote hacked from Patrick's phone and the  
15 allegations and accusation she took from them?

16 A Yes.

17 Q All right. Give me one second; I think I'm  
18 done.

19 So just in followup, we've now kinda come full  
20 circle on several things. I don't wanna beat a dead  
21 horse. Is there anything about these lines of  
22 conversation or topics that we've been over today that you  
23 would either like to clarify for the record or I didn't  
24 ask the right question that you think is relevant to these  
25 discussions that you think would help us understand the

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1 truth of what happened?

2 A You covered it pretty well.

3 Q Thank you. I'll take that as a compliment.

4 All right. Well Wes, listen, you did this  
5 while you don't feel good and I can't tell you how much  
6 I'm appreciative of that and I hope you get to go back to  
7 bed and pull the covers up. Feel better.

8 A Thank you.

9 Q Thank you so much.

10 A Of course. Thanks, guys.

11 MR. BREWER: All right; we'll be in  
12 touch.

13 MR. MacKELCAN: Thank you.

14 MR. BARRETT: Thanks, Doug.

15 THE STENOGRAPHIC REPORTER: Doug, did  
16 you want a copy?

17 MR. MacKELCAN: I don't need a copy of  
18 it.

19 THE STENOGRAPHIC REPORTER: Okay.

20 How 'bout you, Barrett?

21 MR. BREWER: Yes. I'll take the  
22 standard e-tran. And if you can copy Amanda and Nichelle  
23 Robinson.

24 THE STENOGRAPHIC REPORTER: You got it.

25 (The deposition was concluded at 12:41 p.m.)

## COURT REPORTER'S CERTIFICATE

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I DO HEREBY CERTIFY THAT THE TESTIMONY  
CONTAINED IN SAID DEPOSITION WAS, BY ME, REDUCED TO  
WRITING IN THE PRESENCE OF SAID WITNESS BY MEANS OF A  
COMPUTERIZED TRANSCRIPTION. THE SAID DEPOSITION IS A TRUE  
AND ACCURATE TRANSCRIPT OF THE WHOLE OF THE TESTIMONY  
GIVEN BY SAID WITNESS, AS AFORESAID.

I DO FURTHER CERTIFY THAT I AM NOT CONNECTED BY  
BLOOD OR MARRIAGE WITH ANY OF THE PARTIES OR THEIR  
ATTORNEYS OR AGENTS, AND THAT I AM NOT AN EMPLOYEE OF  
EITHER OF THEM, NOR INTERESTED DIRECTLY OR INDIRECTLY IN  
THE MATTER OF CONTROVERSY EITHER AS COUNSEL, ATTORNEY,  
AGENT, OR OTHERWISE.

SIGNED THIS 11th DAY OF MAY, 2025.

\_\_\_\_\_  
LORI WEBBER, NOTARY PUBLIC

My commission expires: April 7, 2027

